

**The British Para Ice Hockey
Association**

**Safeguarding Children and Adults at
Risk (Vulnerable Adults) Policy**

Contents

FOREWORD

Terminology and definitions

Section 1: POLICY

- 1.1 Introduction
- 1.2 Statement of intent
- 1.3 Core Principles
- 1.4 Legislation and government guidance
- 1.5 Objectives
- 1.6 Club responsibilities
- 1.7 Equality
- 1.8 Review and monitoring

Section 2: ABUSE & POOR PRACTICE

- 2.1 Recognising abuse
- 2.2 Abuse of a position of trust
- 2.3 Indicators of abuse
- 2.4 Bullying
- 2.5 Poor practice

Section 3: RESPONDING TO CONCERNS

- 3.1 Introduction
- 3.2 Responding to a disclosure from a child
- 3.3 Reporting concerns
- 3.4 Recording information
- 3.5 Concerns within the sport
- 3.6 Confidentiality and information sharing
- 3.7 Whistle blowing
- 3.8 Media interest
- 3.9 Support services

Section 4: SAFE RECRUITMENT AND SELECTION

- 4.1 Introduction
- 4.2 Planning
- 4.3 Pre interview
- 4.4 Interview
- 4.5 Pre recruitment checks
- 4.6 Induction
- 4.7 Monitoring and appraisal

Section 5: PRACTICAL GUIDANCE

- 5.1 Supervision
- 5.2 Changing facilities
- 5.3 Codes of conduct
- 5.4 Responding to bullying
- 5.5 Photography and use of imagery
- 5.6 Transport
- 5.7 Physical contact
- 5.8 Late collection
- 5.9 E-Safety

Section 6: APPENDICES

FOREWORD

Terminology and definitions

Participants: Anyone undertaking the activity of Para Ice Hockey

Carer: Someone who has the responsibility for providing or arranging care for someone else who, because of long term illness or disability or age, is not able to care for him or herself.

Child/Young Person: Anyone who has not yet reached their 18th birthday. The term 'children' therefore means 'children and young people' throughout.

Vulnerable Adults: Those who are over 18 years of age who maybe in need of community care services by reason of mental or other impairment or illness, and who may be unable to take care of themselves or unable to protect themselves against significant harm or exploitation.

Child protection: The particular activity undertaken to protect specific children who are suffering or are at risk of suffering significant harm as a result of abuse or neglect.

Disabled: The Disability Discrimination Act (1995) defines a person as having a disability 'if he has a physical or mental impairment which has substantial and long-term adverse effect on his ability to carry out normal day to day activities'.

In loco parentis: In loco parentis (from Latin meaning 'in place of a parent') refers to a person who has been given explicit permission to assume parental responsibility for a child by his or her parents or legal guardian.

Parent: The parent refers to the person who holds parental responsibility or the person given the responsibility for the day-to-day care of the child on behalf of the parent or an official body.

Safeguarding: Safeguarding refers to a range of proactive measures taken to keep Children and Vulnerable Adults safe and promote their wellbeing, including child protection.

Social Services: Throughout the procedures the generic term social services is used to represent the relevant Local Authority social services functions with regard to Children and Vulnerable Adults

SECTION 1: POLICY

1.1 Introduction

Participation in the sport of Para Ice Hockey can provide valuable life experiences and has the potential to offer significant learning opportunities for children and adults that can help develop valuable life skills as well as enhancing self-esteem and confidence.

Although many people benefit from participation in sport, some have experienced abuse and/or poor practice linked to it or alternatively may be experiencing abuse unrelated to it. Coaches, volunteers and officials are in the privileged position of having an opportunity to build strong relationships with the people they mentor and are therefore ideally placed to recognise signs that a child or vulnerable may be being abused. This can be achieved by being alert to and aware of the risks which individual abusers, or potential abusers, may pose and being aware of and responding to any indicators that they may be experiencing abuse.

The British Para Ice Hockey Association recognises the importance of ensuring there are procedures in place that outline the appropriate steps to take in the event of a concern. In addition, the Association aspires to provide an environment where individuals feel able to raise concerns and where poor practice and inappropriate behaviour can be safely challenged.

The development of this policy is important to support the Association to fulfil its duty to safeguard and promote the welfare of Children and Vulnerable Adults.

1.2 Statement of intent

The British Para Ice Hockey Association acknowledges the duty of care to safeguard and promote the welfare of children and Vulnerable Adults and is fully committed to developing robust policy and procedures that minimise the risk of participants of Para Ice Hockey experiencing abuse within the sport. The Club further aims to ensure all participants have a positive, enjoyable and beneficial experience in a safe environment and recognises that safeguarding is everyone's responsibility and expects all staff, members and volunteers to be fully committed to promoting and implementing the policy.

1.3 Core Principles

This Policy is based upon the following fundamental principles:

- The welfare of the participant is paramount;
- The participants needs are the central consideration in all decision making;
- All participants, regardless of gender, sexual orientation, age, parental status, disability, religion or belief, colour, race, ethnic or national origins, or socio/economic background have a right to be protected from abuse;
- There is a duty of care to safeguard participants and work in partnership with relevant stakeholders (police, social services, NSPCC, children, parents/carers, other organisations) is key to meeting this responsibility;

- Safeguarding is everybody's responsibility.

1.4 Legislation and government guidance

The following are the key pieces of legislation and government guidance that are most relevant to this policy:

- Children Act 1989
- Human Rights Act 1998
- Data Protection Act 1998
- Sexual Offences Act 2003
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Safeguarding Children: Working Together under the Children Act 2004
- Protection of Freedoms Act 2012

In addition to this the following UK Nation specific pieces of legislation are also relevant.

- Children's Services Co-operation Act (Northern Ireland) 2015
- Safeguarding Vulnerable Groups (Northern Ireland) Order 2007
- Children (Scotland) Act 1995
- Protection of Vulnerable Groups Scotland Act 2007
- Children and Young People Scotland Act 2014
- Social Service and Wellbeing Act (Wales) 2014

1.5 Objectives

The British Para Ice Hockey Association is highly committed to fulfilling its safeguarding responsibilities. The key objectives include:

- To ensure everyone understands their roles and responsibilities in respect of safeguarding and is able to contribute effectively to the safeguarding process;
- To ensure that all those working or volunteering with Children and Vulnerable Adults within the sport are able to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns and able to contribute effectively to safeguarding;
- To ensure everyone has access to opportunities to learn about safeguarding at a level commensurate with their role and responsibilities;
- To promote safe practice and ensure appropriate and timely action is taken to address poor practice;
- To ensure that all allegations or suspicions of abuse are reported to the appropriate agencies and contribute as required to the Child Protection and Vulnerable Adult processes;
- To manage effectively information sharing with other relevant agencies in the interests of safeguarding Children and Vulnerable Adults;

- To operate robust recruitment and selection process to help deter and prevent unsuitable people from becoming involved in the sport and ensure anyone who is subsequently considered unsuitable is removed.

1.6 Association Responsibilities

All registered sports clubs that provide activities and opportunities for Children and Vulnerable Adults have a duty of care to take reasonable steps to ensure their safety and wellbeing.

In order to fulfil this, the British Para Ice Hockey Association will:

- Ensure a senior official within each club is designated – ‘Safeguarding Officer’ with overall responsibility for safeguarding. This role should include:
 - a) Responding to Child Protection and Vulnerable Adult concerns in partnership with the sport’s governing body and local statutory agencies if required;
 - b) Promoting the welfare of participants and the importance of safeguarding;
 - c) Involving Young People and Vulnerable Adults in the safeguarding process;
 - d) Supporting club staff and volunteers to understand their safeguarding role and responsibilities;
 - e) Carrying out regular reviews of safeguarding within the club and ensuring any identified risks are appropriately managed;
 - f) Promoting safe recruitment and selection practices.
- Ensure all staff and volunteers who are working directly or indirectly with Children and Vulnerable Adults receive appropriate training and have access to advice through the club Safeguarding Officer.
- Ensure safe recruitment and selection practices are in operation for all new staff and volunteers working with Children and Vulnerable Adults.
- Ensure that any concerns about poor practice by existing staff and volunteers are addressed.
- Engage with young people and their parents/carers to encourage them to feel able to raise concerns and support them to understand how they can contribute to safeguarding.

NB: It is not the role of anyone within the sport to investigate suspected or alleged abuse. It is everyone’s responsibility to ensure that all concerns are reported without delay, in line with the Associations procedures, to Social Services and/or the Police.

1.7 Equality

The British Para Ice Hockey Association recognises the importance of ensuring that there are procedures in place that ensure *all* participants are protected from abuse and poor practice. The Association further acknowledges that some participants, including those with disabilities or from an ethnic minority community can be more vulnerable to abuse. Care will be taken to ensure additional safeguards are in place to take account of individual needs and recognise that there may be additional challenges that need to be addressed to help all participants raise concerns.

1.8 Review and monitoring

The policy will be reviewed on a four-yearly basis, and in light of:

- Changes in relevant legislation and/or government guidance;
- Requirements of the Local Safeguarding Children and Vulnerable Adult Boards, NSPCC Child Protection in Sport Unit and the British Paralympic Association.
- Learning from serious cases.

In addition, the British Paralympic Association may review the effectiveness and implementation of the policy and procedures by:

- Monitoring compliance with the policy and procedures;
- Carrying out case reviews following the conclusion of any major child protection case within the sport;
- Reviewing the outcomes for the participants in cases where the NGB has taken action;
- Seeking the views of key stakeholders in the sport, including young people.

SECTION 2: ABUSE AND POOR PRACTICE

2.1 Recognising Abuse

Children and Vulnerable Adults can be abused either through someone inflicting harm, or failing to act to prevent harm. Abuse can be carried out by someone known to them or (more rarely) by a complete stranger, and by men, women or other young people. It is not always easy to recognise abuse, especially as many of the indicators can have other reasonable explanations.

Abuse in all of its forms can affect a person throughout their life and it is important that everyone working with Children and Vulnerable Adults is aware of what constitutes abuse, indicators of abuse, what to do, and where to seek advice if abuse is suspected or alleged.

Working Together to Safeguard Children under the Children Act 2004 provides the following definitions of abuse which are also a useful reference when working with vulnerable adults:

Abuse: emotional

The persistent emotional ill-treatment of a child such as to cause severe and persistent adverse effects on the child's emotional and behavioural development.

Within sport examples of emotional abuse may include:

- Continually diminishing a child's efforts;
- Placing intolerable pressure on a child to train and/or win;
- Imposing developmentally inappropriate expectations on a child.

Abuse: neglect

The persistent or severe neglect of a child, or the failure to protect a child from exposure to any kind of danger, including cold, starvation or extreme failure to carry out important aspects of care, resulting in the significant impairment of the child's health or development, including non-organic failure to thrive.

Neglect in a sport may occur if the responsible adult failed to adequately look after Children and Vulnerable Adults in their care, leading them to be placed at risk of harm for example by consistently failing to ensure the use of appropriate protective equipment or clothing suitable to adverse weather conditions.

Abuse: physical

This includes hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates or induces illness in a child whom they are looking after.

In sport an example of physical abuse could include:

- provision of performance enhancing drugs;
- forcing a child into a physically exhausting and painful training regime;
- designing an intensity of training that fails to consider the capacity of the child's immature and growing body;
- Hitting or slapping a child as a form of punishment.

Abuse: sexual

Forcing or enticing a child or vulnerable person to take part in sexual activities, whether or not they are aware of what is happening, including:

- physical contact, including penetrative or non-penetrative acts;
- non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities; or
- Encouraging Children and Vulnerable Adults to behave in sexually inappropriate ways.

In sport, activities which might involve physical contact with Children and Vulnerable Adults could potentially create situations where sexual abuse may go unnoticed. Also the power of the coach over athletes, if misused, may lead to sexually abusive situations developing. There have been a significant number of sexual abuse cases

in sport, many of which have involved coaches, both male and female, who have manipulated a Child and Vulnerable Adult to abuse their position of trust.

2.2 Abuse of a Position of Trust

A relationship of trust exists where an adult, by virtue of their role, is in a position of power or influence over a child, young person or vulnerable adult. The Sexual Offences Act (2003) states that it is a criminal offence for a person in a position of trust defined within the scope of the Act, to engage in any sexual activity with a person over sixteen but under the age of 18 with whom they have a relationship of trust, irrespective of whether the young person has ostensibly consented to the relationship. Although the law does not currently apply to coaches and others involved in sports clubs, The British Para Ice Hockey Association considers that it is completely unacceptable for anyone to engage in sexual activity within a relationship of trust.

It must be stressed that it is always the responsibility of the person in a position of trust to ensure that their conduct is acceptable. Appropriate boundaries in all relationships of trust must be maintained and club officials including coaches must not behave in a manner that would encourage any inappropriate relationships to develop. However, in the event that a person displays signs of attraction within the relationship of trust, this must be reported to the Association Safeguarding Officer and the person in a position of trust may need to remove themselves from the relationship of trust.

2.3 Indicators of Abuse

Even for those experienced in working with abuse, it is not always easy to recognise a situation where abuse may occur or has already taken place. Most people are not experts in such recognition, but indications that a person is being abused may include one or more of the following:

- * unexplained or suspicious injuries such as bruising, cuts or burns, particularly if situated on a part of the body not normally prone to such injuries;
- * an injury for which an explanation seems inconsistent;
- * the person describes what appears to be an abusive act involving them;
- * another child or adult expresses concern about the welfare of a child;
- * unexplained changes in a person's behaviour, e.g. becoming very upset, quiet, withdrawn or displaying sudden outbursts of temper;
- * inappropriate sexual awareness;
- * engaging in sexually explicit behaviour;
- * distrust of individuals, particularly those whom a close relationship would normally be expected;
- * difficulty in making friends;
- * being prevented from socialising with others;
- * displaying variations in eating patterns including over eating or loss of appetite;
- * losing weight for no apparent reason;
- * Becoming increasingly dirty or unkempt.

The above list is not exhaustive and the presence of one or more of the indicators should not be accepted as proof that abuse is taking place. It is **NOT** the responsibility of those involved in the British Para Ice Hockey Association to decide that abuse is occurring. However, it is **everyone's** responsibility to be vigilant and act on any concerns.

2.4 Bullying

Bullying may be perpetrated by an adult, child or group of people. Bullying is defined as deliberate hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves. Bullying can be split into the following categories:

- Emotional - being unfriendly, excluding, tormenting (e.g. hiding belongings, threatening gestures)
- Physical - pushing, kicking, hitting, punching or any use of violence
- Racist - racial taunts, graffiti, gestures
- Sexual - unwanted physical contact or sexually abusive comments
- Homophobic - because of, or focusing on the issue of sexuality
- Verbal - name-calling, sarcasm, spreading rumours, teasing
- Cyber - all areas of internet, such as email & internet chat room misuse, mobile threats by text messaging & calls. Misuse of associated technology, e.g. camera & video facilities

In sport bullying may arise when a parent or coach pushes the child too hard to succeed, or a rival athlete or official uses bullying behaviour.

Signs of bullying include:

- * behavioural changes such as reduced concentration and/or becoming withdrawn, clingy, depressed, tearful, emotionally up and down, reluctance to go to training or competitions
- * an unexplained drop off in performance
- * physical signs such as stomach aches, headaches, difficulty in sleeping, bed wetting, scratching and bruising, damaged clothes, bingeing e.g. on food, alcohol or cigarettes
- * A shortage of money or frequent loss of possessions.

2.5 Poor practice

There are some behaviours or practices that would be considered poor practice and although highly unacceptable within the sport, would not be fully encapsulated by the definitions of abuse. Nevertheless, they must always be reported, addressed and action taken to prevent reoccurrence.

In some cases, there is a fine line between poor practice and abuse and it may be important to seek guidance from Social Services and/or the Police before a concern

is treated as poor practice. If, following consideration by the Safeguarding Officer, senior officials and, if appropriate, following consultation with statutory authorities and the British Para Ice Hockey Association, a concern is deemed to be a matter of poor practice rather than abuse, a suitable course of remedial action should be agreed. Although it is often possible to resolve poor practice through guidance, mentoring and additional training, particularly where the individual is willing to accept their conduct was inappropriate, in some instances, poor practice concerns need to be managed as a disciplinary matter by invoking the appropriate policy and procedures.

Practices never to be sanctioned

The following practices are known to be significant risk factors in cases of abuse and can never to be condoned:

- Taking children to your home or other secluded place unaccompanied by others.
- Engaging in rough, physical or sexually provocative games.
- Sharing a room with a child.
- Allowing or engaging in any form of inappropriate touching.
- Making sexually suggestive remarks.
- Reducing a child/vulnerable person to tears as a form of control.
- Allowing children to use inappropriate language unchallenged.
- Allowing allegations to go unchallenged, unrecorded or not acted upon.
- Carrying out personal care for a child or adult that they can do unaided
- Abusing a privileged position of power or trust.
- Resorting to bullying tactics, or verbal abuse.
- Causing a participant to lose self-esteem by embarrassing, humiliating or undermining the individual.

It may sometimes be necessary for adults to do things of a personal nature for children, particularly if they are young or are disabled. This would include tasks such as removing outer layers of clothing, tying up hair etc. These tasks should only be carried out with the full understanding and (preferably written) consent of parents and the children involved. There is a need to be responsive to a person's reactions. If a person is fully dependent on you, talk with him/her about what you are doing and give choices where possible. This is particularly so if you are involved in a task that involves physical contact. Avoid taking on the responsibility for tasks for which you are not appropriately trained.

Some children, particularly children with learning disabilities or serious physical disabilities may require some assistance with using toilet facilities. In some situations, this may lead to increased vulnerability both for the child and the person providing the care, particularly as some children with learning disabilities can find it difficult to set and maintain physical boundaries. Therefore, where a child requires this type of care, a parent/carer or someone trained in the provision of intimate care must be on hand to address these needs.

Incidents that must be reported/recorded

In the event that any of the following incidents occur, they should be reported immediately to the appropriate Safeguarding Officer, who must make a record of the incident and ensure the parents of the child are informed:

- if you accidentally hurt a child
- if a child seems distressed in any manner
- if a child appears to be sexually aroused by your actions
- if a child misunderstands or misinterprets something you have done.

It is essential that everyone challenges poor practice, even where there is a belief that the motives of an individual are well meaning. Failure to challenge poor practice can lead to an environment where abuse is more likely to remain unnoticed.

SECTION 3: RESPONDING TO REPORTS, DISCLOSURES AND CONCERNS

3.1 Introduction

Abuse concerns can arise in many different situations and contexts. It is not the role of anyone within the sport to investigate possible abuse concerns but it is essential that all staff and volunteers clearly understand the action that must be taken in the event of:

- A direct disclosure of abuse from a child or vulnerable adult;
- A disclosure from an adult of abuse that occurred during their childhood (historical abuse);
- Observed abuse, neglect or poor practice;
- Observed concerning changes in a child or vulnerable adult's behaviour, appearance or relationships, or other possible indicators of abuse;
- A report from a third party (e.g. another child or adult within the Association) or via an external organisation.

The following procedures outline the steps that should be taken and provides guidance on sharing relevant information with Social Services and/or police and other relevant organisations without delay and within agreed protocols.

Child protection/Vulnerable Adult concerns fall into two categories:

- Internal – arising from behaviour or experiences within the sports organisation or environment (e.g. allegations of abuse by a coach);
- External – arising outside the organisation (e.g. allegations of abuse at home or bullying in school).

Everyone has a responsibility to respond to any concerns irrespective of whether the cause of the concern is internal or external and to ensure that they take action by reporting this in line with the organisation's procedures. In some cases, sharing a concern will not trigger an investigation, but may help to build up a picture, along with information from other sources, which suggests that a child may be suffering harm.

If any person has knowledge, concerns or suspicions that anyone is suffering, has suffered or is likely to be at risk of harm, it is their responsibility to ensure that the concerns are referred to social services or the police, who have the statutory duties and powers to make enquiries and intervene when necessary.

3.2 Responding to a disclosure

If anyone discloses that they or another young person is being abused, the person receiving the information should:

- Stay calm and ensure that the child/vulnerable adult feels safe and is not at any immediate risk.
- Show the child/vulnerable adult that you have heard what they are saying, and that you take their allegations seriously.
- Encourage them to talk, but do not prompt or ask leading questions. Don't interrupt when they are recalling significant events. Don't make them repeat their account.
- Recognise any difficulties they may have in explaining the incidents.
- Reassure them that they have done the right thing in revealing the information.
- Explain what actions you must take, in a way that is appropriate to the age and understanding of the child/vulnerable adult.
- Do not promise to keep what you have been told secret or confidential, as you have a responsibility to disclose information to those who need to know. Reporting concerns is not a betrayal of trust.
- Write down as soon as you can and no later than 24 hours what you have been told, using the exact words if possible.
- Record in writing what was said using the child/vulnerable adult's own words as soon as possible. The following information should be included:
 - Dates and times
 - Any names mentioned
 - To whom the information was given
 - Information that is fact, hearsay or opinion should be noted as such
 - Ensure the record is signed and dated.

If they indicate that they do not wish others to be informed about the allegations, it is important to sensitively explain why you need to share the information.

Actions to avoid

- Dismissing the concern
- Panicking
- Allowing shock or distaste to show
- Probing for more information than is offered
- Promising to keep the disclosure secret
- Speculating or making assumptions
- Approaching the accused person (this may put a child/vulnerable adult at further risk and/or jeopardise a criminal investigation).
- Investigation of the disclosure

- Making negative comments about the accused person.

3.3 Reporting concerns

Regardless of how concerns may have arisen, the person who received the disclosure or witnessed an incident must ensure the information is reported. They must not allow personal opinions regarding the credibility of any individual, or the information they have received, to prevent them from making the referral. They should not worry that they may be mistaken as the responsibility to make the assessment of the concern rests with the statutory agencies.

In the event that abuse is suspected, the concern must be reported to Social Services and/or the Police without delay and in all cases, within 24 hours. The following action should be taken:

- Report your concerns to the Association Safeguarding Officer. If they are not available, report the matter to the British Para Ice Hockey Association Lead Safeguarding Officer or a senior person within the organisation.
- The Association Safeguarding Officer or senior person must refer the matter without delay to Social Services and/or the Police and inform the British Para Ice Hockey Association Lead officer. The police need only be called where there is immediate risk to a child or vulnerable adult. If it is believed that there is no immediate danger, the initial referral should be made to Social Services. Concerns that arise outside office hours should be made to the social services emergency duty service or to the police.
- The parent/carer will be informed at the earliest opportunity, unless this is inconsistent with the need to ensure the child's safety, but advice should be sought from Social Services as to what information should be provided to parents, by whom and when.
- If a child is at immediate risk and action needs to be taken urgently, a 999 call must be made to the Police.
- In the event that there is any uncertainty as to whether a referral is appropriate, the Associations Safeguarding Officer, NSPCC 24-hour helpline or Social Services will be able to offer advice on what action to take.

In the case of historical abuse, disclosures must still be reported to Social Services and Police, as above, as the perpetrator may continue to present a risk to other children.

3.4 Recording information

Although urgent referrals should not be delayed, Social Services or Police referrals should be confirmed in writing within two working days and a copy should also be provided to the Association. The report can be made using the Association standard incident reporting form and should contain the following information:

- Personal details of the person concerned including full name, age or date of birth, gender, race, ethnic origin and address.

- Details of parent/carer and an indication of what, if any, information has been shared.
- The nature of the concerns;
- How and why those concerns have arisen;
- Description of any visible injuries including bruising;
- Any observed changes in child's behaviour, relationships, etc
- Detailed description of any account of how any injuries occurred.
- Any times and dates or other relevant information;
- A clear distinction between what is fact, hearsay or opinion;
- Full details of the person about whom the concern/allegation is made including full name, date of birth, address, relationship the child concerned and/or position held in the Association, if any;
- Any information you have on the child's developmental needs;
- Information about the person making the referral, including contact details, role and relationship to the child.

The contact details of the social services duty officer or police officer to whom the concerns were passed, together with the time and date of the call, and any agreed action to be taken should be recorded.

3.5 Concerns within the Sport

Concerns that relate to The British Para Ice Hockey Association staff, members or volunteers will be taken very seriously. Where there is a suspicion that a child/vulnerable adult has been abused by someone within the organisation, in addition to the above procedures, the individual may, in consultation with the statutory agencies, be placed under suspension pending the outcome of Social Services and/or Police enquiries.

In these cases, there may be three types of investigation:

- Criminal - conducted by the police
- Child protection/vulnerable adult investigation - carried out by social services with the police
- The British Para Ice Hockey Association disciplinary investigation - conducted by the organisation on conclusion of statutory agency investigations

The British Para Ice Hockey Association will:

- Consider whether the subject has access to children/vulnerable adults elsewhere and if so who needs to be informed.
 - Work closely with social services and police and attend strategy meetings as required.
 - Provide appropriate support to victims and members who are affected by an abuse situation including, where appropriate, the alleged perpetrator.
 - Follow up any external investigation with an internal action if required
- Irrespective of the findings of a Police/Social Services investigation, The British Para Ice Hockey Association and/or (if appropriate) The British Paralympic Association, will conduct an investigation to determine what, if any action is required to ensure children/vulnerable adults are safeguarded within the sport. Where disciplinary action is deemed appropriate, the civil standard

of proof of the 'balance of probability' will be applied. Thus, the decision will rest on whether it is more likely than not that the allegation is true.

- Refer to the Disclosure Barring Service anyone who has been excluded from the sport (or would or might have been excluded if the individual had not otherwise ceased involvement in the sport) on the grounds that there are concerns that harm or risk of harm has occurred to a child or vulnerable adult.
- Review cases and ensure any preventive measures within the sport are addressed.

3.6 Confidentiality and information sharing

Sharing information is a critical element of safeguarding and protecting children and vulnerable adults. Consent should normally be sought from the subject/s of the information in order for it to be shared, but, in the interests of child protection, it may be necessary for information to be shared with relevant staff and volunteers within The British Para Ice Hockey Association, Social Services, the Police without consent if there is reason to believe that seeking consent could place a child at risk of significant harm.

All staff, members and volunteers are expected to ensure that information relating to a child protection or vulnerable adult concern is passed to the appropriate person within The British Para Ice Hockey Association to enable appropriate action to be taken. It is essential that only those who need to know are informed.

The decision to share will be taken by the Associations Safeguarding Officer, in consultation with association Chairperson or Deputy Chairperson providing that this will not delay the referral. Confidential information will only be passed to agencies that require access for safeguarding purposes on a 'need to know' basis. A record will be maintained of the reason for the disclosure, to whom it was shared and the details that were provided.

3.7 Whistle blowing

Safeguarding children and vulnerable people requires everyone to be committed to the highest possible standards of openness, integrity and accountability. The British Para Ice Hockey Association supports an environment where staff and volunteers, members and their parents/carers and the public are encouraged to raise safeguarding and child protection concerns. Anyone who reports a legitimate concern to the organisation will be supported and all concerns will be taken seriously.

It is acknowledged that individuals are often very reluctant to report concerns through fear of negative reprisal. The British Para Ice Hockey Association will take action against anyone who has harassed or victimised a whistleblower. The identity of individuals who wish to remain anonymous will not be disclosed without first taking time to explain the circumstances in which disclosure may be desirable.

In the first instance, poor practice concerns that relate to a club should be referred to the Association Safeguarding Officer or senior official, except where:

- The whistleblower believes there would be a risk of victimisation, either to the whistleblower or child/children, if the matter was raised internally within the Association; or
- The whistleblower has already raised the matter internally and the matter was covered up or no action was taken and the situation remains unchanged.

3.8 Media interest

Incidents of abuse can generate significant media interest. Anyone who is approached by the media should refrain from providing any information and should follow the following guidance:

- Take a note of the journalist's name and contact details and whom they represent ;
- Establish exactly what information the journalist requires;
- Establish whether the journalist is working to any deadlines and inform them that the matter will be referred to the British Para Ice Hockey Association to discuss a response;
- Inform the appropriate Club Safeguarding Officer or person in charge who must refer the matter to The British Para Ice Hockey Association Safeguarding Officer who will assist in formulating an appropriate response in consultation with senior officials.
- A copy of the response will be sent to the journalist and other relevant individuals.

3.9 Support services

Both the victim of abuse and anyone who is investigated for allegations of abuse may benefit from information about support services. It is also useful to provide this information for anyone else who has been affected by an incident of abuse, including family members, those involved in responding to the incident, and sometimes other children, parents or Association members.

Anyone who has made a disclosure of abuse, has been the subject of an allegation, or has been indirectly affected by an incident will be offered information on support services. Anyone within the organisation who is the subject of an abuse allegation will also be provided with contact details for support services they may require.

SECTION 4: SAFE RECRUITMENT AND SELECTION OF VOLUNTEERS

4.1 Introduction

Although the vast majority of people seeking to volunteer do not present a risk, it is accepted that some individuals have inappropriate motives in seeking this type of work. Safe recruitment and selection procedures should help to deter or prevent inappropriate individuals from gaining positions as well as clarifying the Association's commitment to safeguarding high standards of behaviour.

The British Para Ice Hockey Association is committed to applying a robust recruitment and selection process and recruit individuals who share the Association's values and approach to safeguarding.

These procedures are not applicable in the following cases:

- Parents/carers whose only role is to care for their own child or the person they are caring for.
- One-off volunteers who only have contact for a short period, e.g. young people on work experience, helpers at fundraising events, and are always supervised by appropriately recruited and vetted individuals.

In positions where a Disclosure Barring Service (DBS) check has been deemed by the organisation to be required, these must be repeated at regular intervals of no more than three years throughout the period of deployment.

4.2 Planning

All positions appointed by the Management Committee of the British Para Ice Hockey Association should have a job/role description that describes the range of duties the role will involve. Alongside this there should be a person specification that describes the required attributes. The person specification should be divided into 'essential attributes' which describe what each candidate must be able to demonstrate immediately and 'desirable attributes' that describe qualities that would enable a candidate to perform the duties better and, if not currently possessed, may be gained in time. All person specifications for roles working with children should include suitability to work with children as an 'essential' criterion.

Prior to appointment, all eligible candidates will be asked to provide evidence of a current Disclosure Barring Service (DBS) check. If they are unable to do so then they will be asked to submit to a check prior to commencing any aspect of their role. British Para Ice Hockey Association will determine which roles are eligible for DBS checks, and whether these roles are considered to be in *Regulated Activity*.

Regulated Activity is defined as, work which an individual who is barred from working with vulnerable groups including children must not do.

In summary this includes:

- Unsupervised activities: teaching, training, instructing, caring for or supervising children/vulnerable adults, or providing advice/ guidance on well-being, or driving a vehicle only for children/vulnerable adults.

It is an offence for a barred person to seek to work in regulated activity, and for an employer knowingly to employ a barred person in regulated activity. The Protection of Freedoms Act 2012 legally requires employers to have established whether an individual is barred before placing them in regulated activity.

Full guidance in relation DBS checks and eligibility criteria can be found in Defining ‘Supervision’ and Regulated Activity Sport and Recreation Sector Guidance or via the Home Office

Where the candidate has been resident in a foreign country, it is unlikely that a DBS check will suffice. The ASSOCIATION should seek to access information from the relevant country of origin/residence.

All appointments should be confirmed by the Management Committee on confirmation that the individual has shown their DBS check to the relevant safeguarding lead and a decision has been made on their suitability to undertake the role.

4.6 Induction

All new staff and volunteers should:

- Complete an induction process to familiarise them with the organisation’s policies and procedures and the responsibilities of the post, including safeguarding.
- Be required to sign up to the organisation’s constitution, rules, guidelines, codes of conduct, regulations and policies
- Register as a member of the NGB (if required)
- Complete a probationary/trial period (usually 6 months)

4.7 Monitoring and appraisal

At regular intervals all new and existing staff and volunteers should be given the opportunity to receive and provide feedback relating to their role. All new staff and volunteers should have access to support from a mentor and receive a formal appraisal at the end of their probation period. After this period, appraisal should be provided at regular intervals and a formal appraisal covering safeguard practice completed annually.

5 PRACTICE GUIDANCE

5.1 Supervision ratios

It is essential that appropriate ratios for supervision are adopted and everyone is clear of their supervisory responsibilities. Ratios of adults to children should be determined by considering age, the nature of the activity and where it is taking place.

For club training, The British Para Ice Hockey Association would recommend a minimum ratio of one adult to three children. For events away from the regular club training venue there should be a higher ratio of adults to children.

On all occasions, there must always be a minimum of two responsible adults present. This ensures there is supervision in the event of an accident or incident that requires one of the adults to leave the group to accompany a child.

5.2 Changing facilities

The use of changing facilities can be difficult to regulate where training venues are open to the public and may be mixed gender. All British Para Ice Hockey Association clubs should develop a policy that fits with the specific circumstances in which they operate. The following principles should be adopted:

- Where a club is fully responsible for changing facilities, adults should not be permitted to get changed in these facilities at the same time as children;
- The use of photographic devices, including mobile phone cameras must not be permitted in changing facilities;
- Codes of conduct should cover behaviour whilst using changing facilities;
- Children should be aware that incidents in the changing facilities should be reported without delay.
- Clubs that are unable to provide safe changing room facilities must ensure participants arrive wearing their training clothes

British Para Ice Hockey Association considers it to be good practice to ensure that children are supervised by staff/volunteers of the same gender while changing.

5.3 Codes of conduct

It is important that everyone within the sport is clear about what is considered acceptable conduct when working with children. All staff, members and volunteers must promote good practice and ensure poor practice is challenged. Adhering to the following code of good practice will also help avoid positions where both the responsible adult and the child are vulnerable and create a positive environment within the sport:

- Always work in an open environment (e.g. avoiding private or unobserved situations and encouraging open and transparent communication).

- Always ensure that there is at least one other responsible adult present during training sessions.
- Treat all children fairly, and with respect and dignity.
- Always put the welfare of each child first, before winning or achieving goals.
- Maintain appropriate boundaries in relationships with children, and do not engage in sexual relationships with young people (aged 16 and 17 years) where you are in a position of trust in relation to them
- Build balanced relationships based on mutual trust which empowers children to share in the decision-making process.
- Make sport fun, enjoyable and promote fair play.
- Ensure that if any form of manual/physical support is required, it is provided openly and according to coach education guidelines. Care is needed, as it can be difficult to maintain appropriate hand positions when a child is moving. Young people and their parents should always be consulted and their agreement gained.
- Keep up to date with technical skills, qualifications and insurance in sport.
- Ensure parents/carers understand what is expected of them e.g. that they accept responsibility for transporting their child to and from the sport activity, and for bringing and collecting their child on time.
- Request written parental consent if club officials wish to organise group transport to an event.
- Always ensure parents, teachers, coaches or officials work in pairs if supervising young people, particularly in changing areas
- Ensure that if teams are taken away, they are always accompanied by at least one adult of the same gender. Mixed teams should have both male and female supervision.
- Ensure that at competitions or residential events, adults should not enter children's rooms or invite children into their rooms.
- Be a positive role model - this includes not smoking or drinking alcohol in the company of young people.
- Give enthusiastic and constructive feedback rather than negative criticism.
- Recognise the developmental needs and capacity of young people, avoiding excessive training or competition and not pushing them against their will.
- Secure parental consent in writing to act *in loco parentis*, if the need arises to administer emergency first aid and/or other medical treatment.
- Keep a written record of any injury that occurs, along with the details of any treatment given.

5.4 Responding to bullying

All forms of bullying are unacceptable and will not be tolerated. It is important to ensure children are adequately supervised at all times, to help identify and take action to address any early signs of bullying. The provision of an open environment where participants are encouraged to report any bullying concerns is vital in tackling bullying. The following action should be taken should any incident of bullying occur:

- Offer the bullied person reassurance and try to gain their trust;
- Explain that someone in authority needs to be informed about the bullying;
- Report suspicions or concerns to the person in charge or the club Safeguarding Officer.

Anyone who has been bullied will often benefit from ongoing support to deal with its impact. As well as support from the Safeguarding Officer, victims of bullying can benefit from peer support. It is important that parents/carers are involved as they are likely to be a key source of support. The club/Association may consider holding a reconciliation meeting to help address the issues between the bully and the bullied young person. There are also a number of charities that can provide support to children who experience bullying e.g. Childline or Anti-Bullying Alliance.

5.5 Photography and use of imagery

The British Para Ice Hockey Association believes it is important that parents/carers are able to celebrate the achievements of their children through photographs/film. In addition the Association recognises that promoting images of the sport will help encourage increased participation. However, The British Para Ice Hockey Association acknowledges that there are risks to children associated with the use of photographs on sports websites and other publications.

Photographs can be used as a means of identifying children when they are accompanied with personal information. This information can make a child vulnerable to an individual who may wish to “groom” the child for abuse. In addition, the content of the photo can be used or adapted for inappropriate use. There is evidence of this adapted material finding its way onto sites showing child abuse images.

The British Para Ice Hockey Association does not advocate the banning of photography but recognises the importance of putting in place appropriate and proportionate safeguards to ensure a safe sporting environment for children and young people and allow children (and their parents/carers on their behalf) the right to decide whether their photograph is taken, and how the images may be used.

Photography at events

The British Para Ice Hockey Association permits spectators and accredited professional photographers to take photographs at The British Para Ice Hockey Association events, but requires those organising such events to regulate the taking of photographs and apply, as a minimum, the following safeguards:

- Children and parents/carers should be informed that photography will be permitted at an event and if professional photographers will be present.
- If the media or professional photographers are present at the event, the event organiser is responsible for making sure children and their parents/carers are fully informed why photographs are being taken, where and how they will be published and for obtaining the necessary consents.
- Spectators wishing to take photographs will be required to register with the event organiser the intention to use photographic and video equipment (including mobile phones with cameras) and must acknowledge that the images are for private use and not for publication.
- Professional photographers/filming/video operators wishing to cover an event will need to apply for accreditation by the event organiser at least (*set number of days*) working days before the event. The accreditation process will require proof of professional identification details, which should be verified with the issuing authority prior to the event.
- Anyone who is registered to take photographs will be issued with a photography pass, which they will be required to display at all times during the event.
- A public announcement will be made, prior to the start of the event, outlining the specific details concerning photographic/filming equipment registration. This will also be published prominently in event programmes. The recommended wording is: 'In line with the recommendation in the The British Para Ice Hockey Association Policy, the organisers of this event request that any person wishing to engage in any video or photography should register their details with staff at the spectator desk before carrying out any such photography. The promoter reserves the right to decline entry to any person unable to meet or abide by the organiser's conditions. If you are concerned about any photography taking place at this event, please contact the promoter or event organiser who will be pleased to discuss this matter with you'.
- Anyone registered/accredited to take photographs will be provided with clear guidance on what is considered acceptable in terms of the appropriate imagery and conduct and any areas where photography is forbidden (e.g. changing rooms, toilet areas).
- Unsupervised access to children, one to one photo sessions at events or photo sessions outside the events or at a child's home will not be permitted.
- Any concerns regarding the inappropriate or intrusive use of photographic equipment should be reported to the event organiser or event Safeguarding Officer.

Filming for coaching purposes

There is no intention to prevent club coaches and teachers from using videoing as a legitimate coaching aid, however, it is important to ensure the welfare of children being filmed. The child and their parent/carer must be made aware of the purpose of the filming as a coaching aid and consent obtained. As the filming is not being conducted for publication, it is acceptable to introduce a blanket consent form as part of the process applied when a child joins the club. It is important that appropriate care is taken to securely store the footage to avoid inappropriate usage.

Publication of images

The following guidance should be applied when seeking to publish images:

- Prior to taking photographs or filming a child, the child (or their parent/carer) should be informed of the purpose and where the images will be published e.g. in print or on a website;
- The child (or their parent/carer) should be asked to provide their written consent for their images to be taken and published;
- Images of children should not be accompanied by identifying personal details. This includes first name and surname, address etc. This reduces the risk of inappropriate, unsolicited attention from people within and outside the sport. If it is important to name a child, their image should not be used.
- Only images of children in appropriate sporting attire should be used to reduce the risk of the image being adapted for inappropriate use.
- Sporting action shots should focus on the activity rather than a particular child and should avoid full face and body shots.
- Website managers should carefully monitor content and ensure any inappropriate images or improper text is removed.

The British Para Ice Hockey Association should be informed of any inappropriate use of imagery on websites or any other form of media, which is not in keeping with this guidance. Anyone discovering a child's image that may be illegal should follow The British Para Ice Hockey Association reporting procedures and ensure The British Para Ice Hockey Association Lead Safeguarding Officer and Children's Social Care and/or Police are informed.

5.6 Transport

Although it is always best safeguarding practice to avoid transporting a child alone, The British Para Ice Hockey Association recognises that there are some circumstances where it is unavoidable if a child is to participate in the required training and competition. If all alternatives have been exhausted and a coach or official has to transport a child there are a number of safety measures that should be put in place to minimise the risk:

- Individuals providing transport to children on behalf of the Association or registered club may be required to complete a DBS check and provide evidences of appropriate insurance;
- Ensure the Club Safeguarding Officer has been made aware of the transport arrangements and is given the opportunity to talk to the child/children in advance to check they are comfortable with the plans. The Club Safeguarding Officer should ensure that the children understand their rights and feel able to discuss any concerns or incidents;
- Try to avoid having one child alone with the driver, either by having another adult present or by ensuring children are transported in groups with central pick-up and drop-off points. If the later recommendation is not possible, and the transport arrangements are in place on a routine basis, try to alternate which child is dropped off last;
- Provide parents with full details of any planned breaks in the journey and departure and arrival times;
- Sit children in the back of the car;

- Always use seat belts and booster seats, if required. Requirements should be confirmed prior to the trip.
- Ensure the driver has a point of contact and mobile phone should they break down.

It is accepted that circumstances may arise in event of an emergency, e.g. a child sustains an injury and needs to go to hospital, where an unaccompanied adult may need to transport an unaccompanied child. In such situations, the club Safeguarding Officer or senior official and, where possible, the child's parents should be informed.

5.7 Physical Contact

The use of physical contact in The British Para Ice Hockey Association is important to support the development of skills and techniques, to treat injury or prevent an injury or accident from occurring. Physical contact during participation in The British Para Ice Hockey Association should always be intended to meet the participants needs. It is important to be open and transparent about physical contact as it is possible that legitimate contact may be misconstrued or misunderstood both by the participant and observers.

The following guidance should be applied in respect of any physical contact with children:

- Ensure, in situations where physical contact is necessary to assist with learning, the coach explains to the participant the nature and reason for the physical contact, and unless the contact arises in an emergency and to prevent harm, ask the participant for permission;
- Avoid over handling when assisting anyone;
- Ensure any physical contact takes place in an open or public environment and does not take place in secret or out of sight of others;
- Avoid any gratuitous or unnecessary physical contact with anyone;
- Include guidance on physical contact as part of an induction process or pack for new participants;
- Ensure that anyone with a disability who need to be lifted or manually supported are treated with dignity and respect. Relevant health and safety guidelines must be followed to ensure the safety of the child and those assisting. It is recommended that those assisting receive appropriate training;
- Ensure that any sport science or medical practices or other roles where physical contact is commonplace and/or a requirement of the role is only carried out by trained or qualified practitioners;

- Contact should not involve touching genital areas, buttocks, breasts or any other part of the body that might cause a participant distress or embarrassment;
- Any form of physical punishment of children is unlawful, as is any form of physical response to misbehaviour unless it is by way of physical intervention to prevent a child from harming themselves or others or damaging property;
- Encourage participants to voice concerns in the event that any physical contact makes them feel uncomfortable or threatened.

5.8 Late collection of children

Late collection of children by parents/carers can be challenging for sports officials to manage. One way of addressing this issue is to stress the need for parent/carers to ensure they arrive on time at the end of a session. However, it is appreciated that there are some circumstances beyond the control of the parent/carer that may make it impossible to collect their child on time. Whilst it is not the responsibility of coaches and officials to transport children home on behalf of parents/carers who have been delayed, clubs should adopt the following measures to ensure children are safeguarded:

- Ask parents to provide an emergency contact name and number.
- Provide parents/carers with a contact number for the club and an instruction to call if there is any likelihood of late collection.
- Attempt to contact the child's parent/carer or, if necessary, the emergency contact.
- Ensure that two adults remain with the child at the facility until the parents/carer arrives.
- If appropriate, remind parents/carers of the policy relating to late collection.

The child should not be sent home with another person without permission from a parent/carer.

5.9 E-Safety

e-safety is vitally important in a climate where social media (Facebook, Twitter), IT (internet, gaming, and mobile phones (including calls, texting (SMS and MMS) and instant messaging) are commonly used by children, young people and adults at risk as a primary means of communication with their friends, as well as those who they have a more formal relationship with (e.g. coaches, officials, and other officers involved with the provision of sport). British Para Ice Hockey Association therefore recognise that those individuals who are employed or deployed by British Para Ice Hockey Association are in a position of trust and/or responsibility, and as such need to promote e-safety in the following ways:

- appreciate that social media and IT are an essential part of our lives; enabling us to gather and store information, as well as communicate with each other. It can

be greatly beneficial, but it can also be actually or potentially harmful if misused by an adult or young person

- follow processes which ensure that as an organisation we operate in line with our values to keep children, young people and adults at risk safe, and within the law in terms of how we use social media and IT
- work in partnership with the children, young people, parents, carers, to ensure the welfare of children, young people and adults at risk, and help them to be responsible and knowledgeable in their approach to e-safety.

British Para Ice Hockey Association will seek to promote e-safety by:

- identifying a Coaches Code of Conduct which provides clear and specific directions to staff and volunteers regarding appropriate e-communication using of social media and IT
- identifying an Athlete/Young Person Code of Conduct which provides clear and specific directions about appropriate e-communication using social media and IT
- supporting parents/carers to keep children, young people and adults at risk safe online and when using their mobile phone or gaming console
- developing Disciplinary Procedures which deal firmly, fairly and decisively with any misuse of social media or IT, or complaints/allegations relating to breaches of social media or IT agreements

6. Appendices

Suggested docs for inclusion in appendices:

- **Safeguarding/Child Protection Contacts**
- **Code of ethics**
- **Codes of conduct for parents/carers**
- **Codes of conduct for participants**
- **Reporting procedures flowchart (in sport)**
- **Reporting procedure flowchart (outside sport)**
- **Incident report form**
- **Reference request form**
- **Self-disclosure form**
- **Role description Club Safeguarding Officer**
- **Role description Lead Safeguarding Officer**

****Please note there is a separate appendix template which has examples of these documents****